

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

AFRICAN COMMUNITIES TOGETHER, a  
membership organization; UNDOCUBLACK  
NETWORK, a membership organization;  
DAVID KROMA; MOMOLU BONGAY;  
OTHELLO A.S.C. DENNIS; YATTA  
KIAZOLU; CHRISTINA WILSON;  
JERRYDEAN SIMPSON; C.B., AL. K., D.D.,  
D.K., AL. K., AD. K. by and through their  
father and next friend DAVID KROMA; O.D.,  
and A.D., by and through their father and next  
friend OTHELLO A.S.C. DENNIS; J.S. by  
and through his mother and next friend  
JERRYDEAN SIMPSON,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United  
States in his official capacity; UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY; KEVIN MCALEENAN, Acting  
Secretary of the Department of Homeland  
Security in his official capacity,

Defendants.

Civil Action No. 19-cv-10432-TSH

**CONSENT MOTION FOR LEAVE TO EXCEED PAGE LIMITATION APPLICABLE  
TO PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS THE  
AMENDED COMPLAINT**

Plaintiffs African Communities Together, et al., by and through their undersigned counsel, respectfully move this Court for leave to file an up to 30-page memorandum in support of their Opposition to Defendants' Motion to Dismiss the Amended Complaint, due August 2, 2019. Pursuant to Local Rule 7.1(a)(2), on July 31, 2019, the undersigned counsel for Plaintiffs conferred

with counsel for Defendants about the relief sought herein and Defendants' counsel affirmed that Defendants consent to this motion.

On June 25, 2019, Defendants filed a Motion for Leave to Exceed Page Limitation Applicable to Motion to Dismiss the Amended Complaint. Defendants requested up to an additional eight pages for their memorandum of law in support of their Motion.

By its order of July 1, 2019, the Court granted Defendants' Motion for Leave to Exceed Page Limitation Applicable to Motion to Dismiss the Amended Complaint.

On July 1, 2019, Defendants filed their Motion to Dismiss the Amended Complaint and accompanying 28-page Memorandum in Support of Motion to Dismiss the Amended Complaint.

Defendants' Memorandum raises six separate arguments that involve complex legal issues. Due to the number and complexity of the arguments raised, Plaintiffs require up to ten additional pages to enable them to fully and completely address Defendants' arguments.

Accordingly, for the reasons stated above, Plaintiffs respectfully request the Court to allow Plaintiffs leave to file their Opposition to the Motion to Dismiss the Amended Complaint not to exceed 30 pages.

Dated: July 31, 2019

Respectfully submitted,

/s/ Timothy C. Blank

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**LOCAL RULE 5.2(b) CERTIFICATE OF SERVICE**

I, Timothy C. Blank, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 31, 2019.

/s/ Timothy C. Blank  
Timothy Blank